

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BOARHEAD FARM AGREEMENT GROUP,	:	
	:	
Plaintiff,	:	CIVIL ACTION
	:	
v.	:	NO. 02-3830
	:	
ADVANCED ENVIRONMENTAL TECHNOLOGY CORPORATION, et al.,	:	
	:	
Defendants.	:	

ORDER

AND NOW, this day of , 200 , upon consideration of the Motion of Defendant Ashland Inc. to Strike Plaintiff's Objections to Ashland's Interrogatories and Document Requests, First Sets, and to compel more specific responses thereto, it is hereby **ORDERED** that Ashland's Motion is **GRANTED** as follows:

1. Plaintiff's objections to Ashland's Interrogatories and Document Requests, First Sets, are hereby **STRICKEN**;
2. Within ten (10) days from the date of this Order, Plaintiff shall serve full and complete more specific answers, sworn to by and on behalf of each of the members of the Plaintiff association, to Interrogatory Nos. 1-5, 7-9, 11-16 and 18, not limited by any objections except as to claims of privilege as provided in paragraph 4 hereof;
3. Plaintiff shall serve more specific responses to Ashland's Document Request Nos. 1, 5-8, 10-12 and 15-17, not limited by any objections except as to claims of privilege as provided in paragraph 4 hereof;
4. In the event that Plaintiff withholds any information or documents pursuant to a claim

of privilege, Plaintiff shall provide a privilege log identifying the specific information and documents withheld, the date of each document withheld, the identity of the maker(s) and all intended and actual recipient(s) of such information and documents being withheld, and a statement of the nature of each privilege asserted and the bases therefore sufficient to enable a determination to be made as to whether a privilege applies;

5. As to any references by Plaintiff in its more specific answers and responses to be served pursuant to this Order that are intended to constitute Plaintiff's answer to a specific Interrogatory or Document Request, Plaintiff shall specifically identify each document which Plaintiff believes contains the particular information specifically requested in Ashland's Interrogatories or that represents a document responsive to Ashland's requests for production and Plaintiff shall provide a designation of the Bates number or other designation of each such document that will enable Ashland to readily identify and locate each designated document;

6. Furthermore, with respect to Ashland's Interrogatory No. 2, Plaintiff's more specific amended answers shall provide the information requested as to all hazardous substances that, to Plaintiff's knowledge or information and belief, the Environmental Protection Agency has directed be cleaned up at the Boarhead Farm Site and as to all hazardous substances that the Plaintiff association and/or its members have agreed to clean up at the Site;

7. Plaintiff's more specific answers to Interrogatory Nos. 3, 4, 5, 8, 9 and 14 shall include the information requested as to all past and estimated future response costs;

8. Plaintiff's more specific answers to Interrogatory Nos. 11, 12 and 13 shall set forth the information requested as to all response costs and attorney's fees;

9. Plaintiff's more specific answers to Ashland's Interrogatories shall specifically indicate that such more specific answers are being provided on behalf of the Plaintiff and all

individual members of the Plaintiff association, which answers shall be attested by and on behalf of each member of the Plaintiff association; and

10. Any and all references to deposition testimony in Plaintiff's more specific answers and responses shall specifically identify the name of the deponent, the name and docket number of the proceeding in which such testimony was given, the date(s) of each deposition and the identity of the court reporter before whom the deposition was taken.

BY THE COURT:

Legrome D. Davis, U.S.D.J.